

EXHIBIT 4

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JENNIFER HOUGH,

Plaintiff,

- against -

ONIKA TANYA MARAJ, AKA (“NICKI MINAJ”)
and KENNETH PETTY, AKA (“ZOO”),

Defendants.
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:
: Civil Action No. 21-cv-04568
: (ENV) (JRC)
:

: **DECLARATION OF STEVEN D.**
: **ISSER**
:

STEVEN D. ISSER, declares under penalties of perjury pursuant to 28 U.S.C. § 1746:

1. I am an attorney admitted to the Bar of this Court and am counsel to Defendant Kenneth Petty (“Defendant”) in the above-captioned action. I am fully familiar with the facts set forth below and I submit this Declaration in opposition to the motion of Plaintiff Jennifer Hough for a default judgment, pursuant to Rule 55 of the Federal Rules of Civil Procedure.

2. Attached hereto as Exhibit (“Ex.”) 1 is a true and correct copy of the Amended Complaint in this action, dated September 2, 2021, filed by Plaintiff Jennifer Hough (“Plaintiff”).

3. Attached hereto as Ex. 2 is a true and correct copy of emails dated October 13, 2021 between Judd Burstein, Esq. (counsel for co-defendant Onika Tanya Maraj) and Tyrone Blackburn, Esq. (counsel to the Plaintiff this action), which were previously filed with the Court.

4. Attached hereto as Ex. 3 is a true and correct copy of the Affidavit of Service, dated September 16, 2021, concerning purported service on Defendant, which was previously filed by the Plaintiff in this action.

5. Attached hereto as Ex. 4 is a true and correct copy of the Affirmation in Support of Request for Certificate of Default by Tyrone Blackburn, Esq., affirmed on October 11,

2021, previously filed by Plaintiff in this action.

6. Attached hereto as Ex. 5 is a true and correct copy of the Request for a Certificate of Default filed by Plaintiff in this action, dated October 11, 2021

7. Attached hereto as Ex. 6 is a true and correct copy of the Certificate of Default entered against Defendant in this action, dated October 19, 2021.

8. Judd Burstein, Esq. referred Defendant to me for representation and I was fully retained by Defendant the evening of October 20, 2021 and waited until I had completed drafting the motion papers to vacate the Certificate of Default before I filed a Notice of Appearance.

9. Although I spoke with an individual who identified herself as Lexie Chung, I never met with Lexie Chung. Further, I spoke with this individual because I believed she could provide information relevant to the defense of this action. There was nothing improper in our conversation.

10. Attached hereto as Ex. 7 is a true and correct copy of the joint letter dated October 25, 2021, filed with the Court that day, in which I sought the Court's approval of the briefing schedule for Defendant's motion to vacate the Certificate of Default.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 8th day of November, 2021, in the State of New Jersey, County of Union.



Steven D. Isser